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*Attorneys for Plaintiff*  
*Thomas Hussey*

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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<p>THOMAS HUSSEY,  Plaintiff,  v.  KNOCKOUT INDUSTRIES, LLC, TONYA DANIEL and DOES 1-10,  Defendants.</p>	<p><b>Case No.: 1:18-cv-07893-PGG</b></p>
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**DECLARATION IN SUPPORT OF REQUEST FOR DEFAULT JUDGEMENT**

I, R. Terry Parker, declare as follows:

1. I am the attorney for plaintiff Thomas Hussey (“Plaintiff”), in the above-captioned action.
2. The complaint in the above-captioned action was filed on August 29, 2018 and is attached hereto as Exhibit A.
3. On August 31, 2018, I caused a request for a waiver of service pursuant to Rule 4 of the Federal Rules of Civil Procedure to be sent by FedEx to defendants Knockout Industries, LLC (“Knockout”) and Tonya Daniel at the address of 1846 Washington Avenue, Bronx, New York, 10457, the last known address for Ms. Daniel and Knockout. Attached hereto as Exhibit B is a copy of Plaintiff’s correspondence dated August 31, 2018.

4. On September 20, 2018, having received no answer to our request for a waiver of service and having learned that Knockout and Ms. Daniels were possibly doing business at another address, namely, at 4306 3<sup>rd</sup> Avenue, 3<sup>rd</sup> Floor, Brooklyn, New York 11232, I caused a request for a waiver of service pursuant to Rule 4 of the Federal Rules of Civil Procedure to be sent to 4306 3<sup>rd</sup> Avenue, 3<sup>rd</sup> Floor, Brooklyn, New York 11232. Attached hereto as Exhibit C is a copy of Plaintiff's correspondence dated September 20, 2018.

5. On October 16, 2018, I caused Knockout to be served by delivering to and leaving with an agent of the Secretary of State, of the State of New York, two copies of the summons and complaint. A copy of the affidavit of service is attached hereto as Exhibit D.

6. On October 16, 2018, this office followed service on the Secretary of State by e-mailing copies of the summons and complaint to Tonya Daniels and Knockout at [thckdimepz@hotmail.com](mailto:thckdimepz@hotmail.com). Attached hereto as Exhibit E is a copy of Plaintiff's email correspondence dated October 16, 2018.

7. Again, on November 30, 2018, this office followed service on the Secretary of State by e-mailing copies of the summons and complaint to Tonya Daniels and Knockout at [tonyatko@gmail.com](mailto:tonyatko@gmail.com). Attached hereto as Exhibit F is a copy of Plaintiff's email correspondence dated November 30, 2018.

8. The time for defendants Knockout Industries, LLC and Tonya Daniel, to answer or otherwise move with respect to the complaint herein has expired.

9. Defendants Knockout and Tonya Daniel, have not answered or otherwise moved with respect to the complaint, and the time for defendants Knockout and Tonya Daniel to answer or otherwise move has not been extended.

10. Defendants, upon information and belief, are not infants or incompetents and are not on active duty in the U.S. Military.

11. Attached hereto as Exhibit G is an invoice for the series of photographs from which the copyrighted work at issue in this case was taken, such invoice indicating the monetary value of the works.

12. Attached hereto as Exhibit H is spreadsheet showing the attorney's fees and costs incurred in pursuing this action.

I declare that the forgoing is true and correct under the penalty of perjury under the laws of the United States.

Executed on this 25<sup>th</sup> day of January, 2019.

/s/ R. Terry Parker  
R. Terry Parker, Esquire